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November 21, 2003

**Via ECFS**

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Oral Ex Parte Presentation in IB Docket No. 00-248**

Dear Ms. Dortch:

On behalf of QUALCOMM Incorporated ("QUALCOMM"), this is to report that on November 20, 2003, Jan King, a consultant to QUALCOMM, had a telephone conversation with Andre Rausch of the staff of the International Bureau concerning the written ex parte presentation made in this proceeding by QUALCOMM on November 19, 2003. During this conversation, Mr. King and Mr. Rausch discussed:

- The nature of the distribution function: Poisson distribution vs. Binomial Distribution.
- The effects of Earth terminal pointing error and how our system deals with these errors.

Mr. King's main points were:

1) That the distribution for the QUALCOMM Ka-Band system under development is technically a binomial distribution, because the number of users on any given channel is finite. If the user terminal number was very large (approaching infinity), then a Poisson distribution would be the correct one to use. These are both discrete distribution functions. QUALCOMM's presentation uses a Gaussian distribution, which is a good approximation for its binomial distribution and is understood by a larger audience. Even though it is a continuous function, it envelops the other two discrete functions. In fact, all three distribution functions are quite similar as they may be applied to our situation.

2) The QUALCOMM system accounts for terminal errors in pointing in both terms of both the SNR performance within our system and the ASI to adjacent (other) systems. QUALCOMM has not described this in its recent statistical arguments, however, and Mr. King told Mr. Rausch that QUALCOMM would like to provide the Commission with a supplemental document which discusses the worst case off-axis antenna pointing statistics and how it affects the calculations we have already provided.

I am filing this Notice in the ECFS system.

Sincerely yours,

/s/ Dean R. Brenner

Dean R. Brenner
Senior Director, Government Affairs
Attorney for QUALCOMM Incorporated

Cc: Andre Rausch